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15 *Counsel for Defendant Meta Platforms, Inc.*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 RICHARD KADREY, *et al.*,  
20 Individual and Representative Plaintiffs,  
21 v.  
22 META PLATFORMS, INC., a Delaware  
corporation;  
23 Defendant.  
24

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
SCHEDULING OF DEPOSITION**

1 Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher  
2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,  
3 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher  
4 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the  
5 “Parties”) by and through their respective counsel stipulate to the following:

6 WHEREAS, the Court entered an Order extending the discovery deadline until December  
7 13, 2024, ECF No. 211;

8 WHEREAS, to accommodate the schedule of Meta CEO Mark Zuckerberg and avoid  
9 submitting a scheduling dispute to the Court for resolution, the Parties agreed to seek leave of Court  
10 to take Mr. Zuckerberg’s deposition on Tuesday, December 17, 2024—four days after the Court’s  
11 December 13, 2024 fact discovery deadline;

12 WHEREAS, there has only been one extension of the fact discovery deadline requested and  
13 entered in this case, which was the Court’s Order setting the December 13, 2024 fact discovery  
14 deadline, ECF No. 211;

15 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through  
16 Plaintiffs and Defendant, as represented by their undersigned counsel and subject to the approval  
17 of the Court, that the deposition of Mr. Zuckerberg may occur on Tuesday, December 17, 2024,  
18 after the close of fact discovery. No other deadlines are modified by this stipulation.

Dated: November 12, 2024

Respectfully Submitted,

By: /s/ Bobby Ghajar

By: /s/ Maxwell V. Pritt

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*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

**PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**

DATED: November 13, 2024

  
\_\_\_\_\_  
HON. VINCE CHHABRIA  
United States District Judge